

## REMARKS

Claims 1-13 are pending herein with Claim 1 being an independent claim. Claims 14-21 have been withdrawn. Claims 1-10 stand rejected.

### 35 U.S.C. § 103

Claims 1-10 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,134,924 to Vicker in light of U.S. Patent No. 1,182,904 to Hamilton, et al. Vicker was described as showing a brewing device with a turret frame 10, a turret plate 26, and a turret shaft 78. Hamilton was described as showing male and female connectors.

The Applicant respectfully traverses the rejection of independent Claim 1. Although Vicker does show a connecting shaft 78, the shaft 78 is not useable with the connecting means shown in Hamilton. Specifically, the shaft 78 is hollow and includes the conduit section 49''. The conduit section 49'' allows excess moisture, steam, and like to pass therethrough to a drain or collection facility 79. See Col. 7, lines 39 – 51 and Fig. 5:

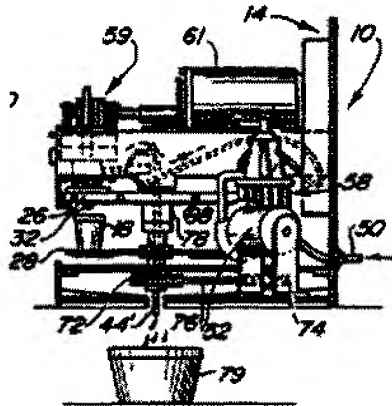


FIG. 5

There is no disclosure in Vicker as to removing the turret plates. There is no disclosure in either reference as to how one could adapt the conduit 49'' of Vicker to the connection means described in Hamilton. Rather, the conduit 49'' extends without interruption across the several turret plates. Further, there is no disclosure in either reference as to how the connection means described in Hamilton could be used with a

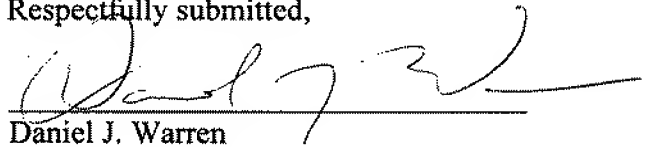
conduit. The Applicant thus submits that, when taken as a whole, Vicker actually teaches away from the invention as claimed in Claim 1 because of the use of the hollow shaft. *See* MPEP § 2141.02(VI). The shaft of Vicker cannot be the basis of an obviousness rejection because it is incapable of being modified for use with the connection means of Hamilton.

Further, even if the conduit 49'' of Vicker could be modified with the connector of Hamilton, there is no suggestion in the references to do so. Vicker is completely silent on removing the plate. The connector of Hamilton has been around for more than ninety years, but apparently has never applied in this context. Although ease of removing the plate is an advantage of this claim, the prior art is silent on suggesting the combination. *See* MPEP §2143.01(III) (“[t]he mere fact that the references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination.”) (Emphasis in the original.) The Applicant thus submits that independent Claim 1, and the dependent claims thereon, are patentable over the cited references.

### CONCLUSION

The Applicant believes it has responded to each matter raised in the Office Action. Allowance of all claims is respectfully solicited. Any questions may be directed to the undersigned at 404-853-8028.

Respectfully submitted,



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